



Federal Communications Commission
445 12th Street SW
Washington, DC, 20554

Date: July 21, 2017

RE: GN Docket No. 12-354 - 3.5 GHz Band / Citizens Band Radio Service

To Whom It May Concern,

I am writing on behalf of Hudson Valley Wireless. We are a Competitive Local Exchange Carrier (CLEC) focused on deploying broadband Internet Access to unserved and underserved communities.

Many of the markets we serve, do not have access to affordable wireline solutions. In many cases, these communities rely on a small regional provider as a last resort to providing Broadband Internet Access. Many of these rural communities are already at a socioeconomic disadvantage.

CTIA and T-Mobile have recently filed petitions to modify the PAL areas to consist of Partial Economic Areas (PEAs) instead of Census Tracts. The larger PEA's will prohibit smaller providers from participating in the auctions.

We are ultimately concerned about the potential impact the change will have on the smaller regional providers ability to extend the network into unserved markets. If the commission modifies the PAL area to accommodate the mobile wireless providers, we can assume that the majority of the spectrum will be deployed in denser urban areas. Our fear is that the proposed changes will only increase the digital divide between urban and rural users.

Investment in broadband are also investments in jobs creation. We respectfully ask the commission to consider the indirect benefits of allowing the spectrum to be used for rural broadband deployments and the consequences of restricting the bidding to larger providers if the auction is based on PEA's.

Sincerely,

Jason W Guzzo

Jason Guzzo
General Manager

Local 518.458.7006
Toll Free 888.348.9312



518.379.9462



www.hvwisp.com



34 Russell Road Albany, NY 12205

